

RECEIVED  
SEC MAIL ROOM

TATE AHLERT & CO.

2002 JAN -2 P 1:31

A Professional Corporation Business Advisors and CPAs

October 19, 2001

Ms Julie Perry  
Federal Election Commission  
Washington, D.C. 20463

ID: C00084822

Reference: October Quarterly Report (7/1/00-9/30/00)

Dear Ms. Perry:

Please find enclosed your letter dated October 11, 2001. We are providing the following information to clarify our "best efforts".

In order to establish "best effort" we have included the following information. Again, we believe that all requirements of federal law were met. Our original solicitation (copy enclosed) requested contributor information. If the information was not reported with the contribution an oral request was to be made. We were able to find this schedule showing that an oral request was made for the missing information, asking for the missing information, and telling the contributor of the federal law for reporting such information. The employee who was responsible for completing this documentation is no longer with the Inn/PAC International Association of Holiday Inns, Inc.

We believe this information complies with your request:

- Both the initial and the follow-up oral request informed the contributor of federal law.
- Each contributor was individually contacted to obtain missing information
- This oral request was made within the required 30 days.
- A copy of the initial solicitation and the follow-up log are enclosed.

Please contact me if you have any questions.

Sincerely,



Mary Sue Ahlert, CPA

RECEIVED  
FEC MAIL ROOM

2002 JAN -2 P 1:37

RQ-3



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 11, 2001

John E. Webster, Treasurer  
Inn/PAC Int'l Assn. of Holiday Inns Inc.  
Political Action Committee  
Three Ravinia Drive, Suite 2000  
Atlanta, GA 30346

Identification Number: C00084822

Reference: October Quarterly Report (7/1/00-9/30/00)

Dear Mr. Webster:

On September 19, 2001, you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

Your October 4, 2001, response is incomplete because you have not provided all the requested information. For this response to be considered adequate, the following information is still required.

-You have included a copy of your original solicitation as well as a description of your procedures used to obtain missing occupation and employer information. In order to establish 'best efforts' you still need to clarify the following:

- each initial solicitation and follow-up effort must inform the contributor of the requirements of federal law for the reporting of such information;
- each follow-up request is a stand alone effort to obtain the missing information;
- each oral follow-up request is documented in writing;
- each written follow-up request includes a pre-addressed post card or return envelope; and

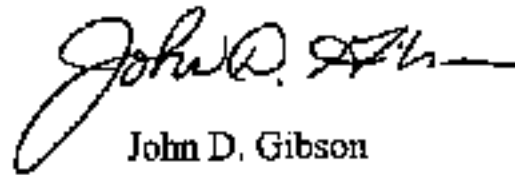
- the effort to obtain the information occurs no more than 30 days after receipt of the contribution.

Please provide the missing information or a more detailed description of your procedures for requesting the information. Photocopies of your original solicitation and follow-up request may also be provided.

An adequate response must be received at the Commission by October 31, 2001. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

If you should have any questions related to this matter, please contact Julie Perry on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or our local number (202) 694-1130.

Sincerely,



John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Dear INN-PAC:

I have ownership in the following Six Continents Hotels properties: *(If more than four, please attach separate sheet).*

---

---

---

---

- ☐ Enclosed is my personal or partnership check in the amount of \$\_\_\_\_\_.
- ☐ Please bill me annually for the recommended amount of \$150 x the number of Six Continents Hotels properties I own and operate.
- ☐ Please bill me annually in the amount of \$\_\_\_\_\_.
- I understand that I may cancel this annual billing at any time.*

NAME \_\_\_\_\_

TITLE \_\_\_\_\_

COMPANY \_\_\_\_\_

ADDRESS \_\_\_\_\_

CITY \_\_\_\_\_ STATE \_\_\_\_\_ ZIP \_\_\_\_\_

PHONE \_\_\_\_\_

FAX \_\_\_\_\_

EMAIL \_\_\_\_\_

The LAHI INN-PAC Committee suggests you make a minimum contribution of \$150 per hotel. The Federal Election Commission allows only personal or partnership checks. With a partnership check, the FEC requires the names of all the partners. As with other political action committees, contributions to INN-PAC are not deductible as charitable contributions for Federal Income Tax purposes.

**INN-PAC Three Ravenna Drive, Suite 2900  
Atlanta, GA 30346-2149 770-604-5555**



**lahi**



**INN-PAC**  
THE LAHI POLITICAL  
ACTION COMMITTEE



# INN-PAC

THE IAH! POLITICAL  
ACTION COMMITTEE



In 1978, the IAH! recognized the need of the Holiday Inn system (Six Continents Hotels) to speak with a strong, unified voice in our nation's Capitol. With this in mind, we formed INN-PAC—a political action committee dedicated to the preservation of the free enterprise system. Since its inception, INN-PAC has become one of the most influential business-oriented political action committees in the nation.

INN-PAC is a non-partisan PAC that supports Congressional candidates, both challengers and incumbents, who share our progressive business philosophy. Through our contributions, we are helping to shape America's economic future.

The INN-PAC committee meets periodically to carefully review and evaluate positions and voting records of Congressional candidates. The committee's objective is clear—to assist candidates whose election will improve the climate for business and, more specifically, the travel and tourism industry.

Your contribution to INN-PAC is an investment in the future, health and well being of the Six Continents Hotels system. It is essential that we, as an integral part of that system, help protect and sustain it.

Please send your personal or partnership check to INN-PAC now. Together, we can make a difference.

## Questions & Answers about INN-PAC

**Q. Should my check to INN-PAC be a personal or partnership check?**

**A.** Federal law prohibits corporations from making political contributions; therefore, political contributions must come from individuals by personal or partnership checks. On partnership checks, the FEC requires the names of all partners.

**Q. Why not give to candidates individually?**

**A.** You can, but by contributing a larger aggregate amount in the name of Six Continents Hotels, we will create a greater impact. Candidates maintain a list of contributions including the amount contributed. By presenting a unified front, the system gets more "bang for the buck."

**Q. How much may I contribute to INN-PAC?**

**A.** Federal law allows an individual to contribute a maximum of \$5,000 in any calendar year to INN-PAC.

**Q. If I give \$5,000 to INN-PAC in one year, may I give more through other PACs or to the candidates directly?**

**A.** Yes. You may give up to \$5,000 to other PACs per year and up to \$1,000 to an individual candidate per election. Your total contribution cannot exceed \$25,000 per calendar year.

**Q. Who does the INN-PAC committee receive input from before making its final decision on recipients of contributions?**

- Information provided by franchisees from the candidates' respective districts and/or areas
- Information from individual contributors
- Meetings and discussions with Six Continents Hotels and its Washington Counsel
- United States Chamber of Commerce
- American Hotel & Motel Association
- National Restaurant Association
- Travel/Tourism industry scores

**Q. I want to support the Six Continents Hotels system through INN-PAC. What should I do?**

**A.** Complete the form provided with this brochure and return it with your personal or partnership check.

NAME	PHONE #	Date of Contribution	Date of Oral request for missing information	Description of conversation/or message
Brehm, William	517-773-9466	8/3/00	8/25/00	Left Voice mail message
Campbell, Charles	252-792-3500	7/28/00	8/25/00	Left Voice mail message
Gurry, David	501-785-0844	7/19/00	8/25/00	Left Voice mail message
Davidson, Niel	408-252-8935	8/4/00	8/25/00	Left Voice mail message
Ernst, Clifford	615-822-3215	7/25/00	8/25/00	Left Voice mail message
Fink, Carl	608-365-6000	8/3/00	8/25/00	Left Voice mail message
Francis, Jamile	864-242-6440	9/2/00	8/25/00	Left Voice mail message
Friedman, Sam	214-224-8100	7/25/00	8/25/00	Left Voice mail message
Gagliano, Mary	732-441-3295	8/10/00	8/25/00	Left Voice mail message
Glover, George	813-886-4906	8/10/00	8/25/00	Left Voice mail message
Graulich, William	873-892-9595	8/3/00	8/25/00	Left Voice mail message
Hart, Bill	770-604-2000	8/23/00	8/25/00	Left Voice mail message
Helm, Charles	903-885-7883	7/24/00	8/25/00	Left Voice mail message
Hembree, Roger	405-943-0224	7/18/00	8/25/00	Left Voice mail message
James, David	870-862-1662	7/21/00	8/25/00	Left Voice mail message
Luss, Serge	518-523-3821	7/25/00	8/25/00	Left Voice mail message
Marshall, Bill	308-384-5006	8/2/00	8/25/00	Left Voice mail message
Menna, Anthony	727-799-1181	8/4/00	8/25/00	Left Voice mail message
Orleans, Arnold	301-657-8755	8/3/00	8/25/00	Left Voice mail message
Phillips, Brice	410-289-6821	7/21/00	8/25/00	Left Voice mail message
Pullen, William	561-398-0159	7/26/00	8/25/00	Left Voice mail message
Redaelli, Robert	580-2256225	8/7/00	8/25/00	Left Voice mail message
Richardson, Phil	757-258-3200	8/3/00	8/25/00	Left Voice mail message
Schahet, Gary	317-255-5052	7/15/00	8/25/00	Left Voice mail message
Smith Roy	937-223-8883	8/10/00	8/25/00	Left Voice mail message
Sterchi, Robert	865-458-6386	8/1/00	8/25/00	Left Voice mail message
Travis, Ashar	228-388-3663	7/26/00	8/25/00	Left Voice mail message
Vespiar, David	513-523-4161	8/2/00	8/25/00	Left Voice mail message

Note: The message left for each of these contributors was: In order to comply with federal law we need to report the name of your employer.  
If you are self-employed (or a partner in a business) you do not need to respond to this message.

## Federal Election Commission

**ENVELOPE REPLACEMENT PAGE  
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

<input type="checkbox"/> Hand Delivered	Date of Receipt
<input type="checkbox"/> First Class Mail	POSTMARKED
<input checked="" type="checkbox"/> Registered/Certified Mail	POSTMARKED (R/C) 10-25-01
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> Received from the House office of Records and Registration	Date of Receipt
<input type="checkbox"/> Received from the Senate Office of Public Records	Date of Receipt
<input type="checkbox"/> Other ( Specify):	Postmarked and/or Date of Receipt
<input type="checkbox"/> Electronic Filing	
<i>See</i> PREPARER	1-2-02 DATE PREPARED